

1 **AMANDA L. IRELAND, ESQ.**

2 Nevada Bar No. 13155

3 **IRELAND LAW GROUP, LLC**

4 7854 West Sahara Ave.

5 Las Vegas, Nevada 89117

6 T: (702) 427-2110

7 F: (702) 441-7637

8 E: amanda@irelandlawgroup.com

9 *and*

10 **GABRIEL L. GRASSO, ESQ.**

11 Nevada Bar No. 7358

12 **GABRIEL L. GRASSO, P.C.**

13 411 South 6th Street

14 Las Vegas, NV 89101

15 T: (702) 868-8866

16 F: (702) 868-5778

17 E: gabriel@grassodefense.com

18 *Attorneys for Defendants*

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 SARA KIM NGUYEN, individually,

22 Case No.: 2:21-cv-00213-KJD-BNW

23 Plaintiff,

24 vs.

25 LANE F. SMITH, M.D., individually; SMITH
26 SALON, LLC dba Chic La Vie, a Limited-
27 Liability Company; SMITH PLASTIC
28 SURGERY INSTITUTE, PC, a Professional
29 Corporation; SMITH PLASTIC SURGERY
30 BUILDING LLC, a Limited-Liability Company;
31 ROE ENTITIES I – V, inclusive,

32 **STIPULATION AND PROPOSED
33 ORDER TO EXTEND TIME FOR
34 DEFENDANT LANE F. SMITH, M.D.
35 TO FILE HIS REPLY TO IN
36 SUPPORT OF MOTION TO SEAL
37 OR STRIKE
(First Request)**

38 Defendants.

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40 Defendant Lane F. Smith, M.D. (hereinafter “Dr. Smith”) by and through his counsel,
41 Amanda L. Ireland, Esq. and Gabriel L. Grasso, Esq., and Plaintiff, Sarah Kim Nguyen, by and
42 through her counsel of record Andre M. Lagomarsino, Esq. and Cory M. Ford, Esq., do hereby
43 agree and stipulate to an 14-day extension for Dr. Smith to file a Reply in Support of his Motion

1 to Seal Complaint, or in the Alternative, Motion to Strike Scandalous Immaterial Matter (Doc. 9)
2 ("Motion to Seal or Strike") from March 23, 2021 until April 6, 2021.

3 The Complaint was filed on February 9, 2021, the Motion to Seal or Strike was filed on
4 February 26, 2021, and a hearing on the Motion was set for May 6, 2021 at 10 am.

5 This is Dr. Smith's first request for an extension of the Motion to Seal or Strike Reply
6 deadline, and is submitted pursuant to Local Rules IA 6-1, 6-2 and II 7-1.

7 The extension is requested based on agreements between counsel and for good cause. The
8 parties previously stipulated to extend the time for Plaintiff to respond to the Motion to Seal or
9 Strike from March 12th until March 22nd. (Doc. 13) The Stipulation was granted on March 15th.
10 (Doc. 14) The next day, March 16th, somewhat unexpectedly for defense counsel, Plaintiff filed
her Opposition. (Doc. 15)

11 Counsel for the parties participated in the Rule 26(f) conference on March 22, 2021,
12 during which they agreed an extension for Dr. Smith's Reply was appropriate as a matter of
13 professional courtesy, as well as consistent with the parties' interest in attempting informal
14 settlement discussions prior to the hearing on the Motion to Seal or Strike.

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1 Accordingly, Dr. Smith shall have up to and including April 6, 2021 to file his Reply in
2 support of the Motion to Seal or Strike.

3 Dated this 22nd day of March 2021.
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5 IRELAND LAW GROUP, LLC

6 */s/ Amanda L. Ireland*
By: _____
7 AMANDA L. IRELAND, ESQ.
7854 West Sahara Ave.
Las Vegas, Nevada 89117
8 Tel: (702) 427-2110
Fax: (702) 441-7637
9 amanda@irelandlawgroup.com
GABRIEL L. GRASSO, ESQ.
GABRIEL L. GRASSO, P.C.
Nevada Bar No. 7358
11 411 South 6th Street
Las Vegas, NV 89101
12 T: (702) 868-8866
F: (702) 868-5778

13 *Attorneys for Defendants*
14

Dated this 22nd day of March 2021.

LAGOMARSINO LAW

/s/ Andre M. Lagomarsino
By: _____
ANDRE M. LAGOMARSINO, ESQ.
CORY M. FORD, ESQ.
3005 W. Horizon Ridge Pkwy. #241
Henderson, Nevada 89052
aml@lagomarsinolaw.com
cory@lagomarsinolaw.com
Phone: (702) 383-2864
Fax: (702) 383-0065

Attorneys for Plaintiff

15 IT IS SO ORDERED:

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17 _____
UNITED STATES MAGISTRATE JUDGE

18 Dated: March 26, 2021.
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